

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO.: 04- 11572 JLT

_____)
SUSAN COONEY,)
Plaintiff,)
)
v.)
)
SAYBROOK GRADUATE SCHOOL)
AND RESEARCH CENTER and)
MAUREEN O'HARA, Individually,)
Defendants.)
_____)

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rules of Civil Procedure 56, defendants, Saybrook Graduate School and Research Center and Maureen O'Hara, move this Court to grant summary judgment on all counts of plaintiff's Amended Complaint as based on the record, the plaintiff cannot sustain her burden of proof on all elements of each claim.

In support of this Motion, the defendants submit the accompanying memorandum of law.

REQUEST FOR ORAL ARGUMENT

Respectfully Submitted By,

Counsel for Defendants,
SAYBROOK GRADUATE SCHOOL AND
RESEARCH CENTER
and MAUREEN O'HARA

/s/Grace V. Bacon Garcia

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Local Rule 7.1(A)(2)

I, Grace V. Bacon Garcia, Esquire, counsel for the defendants hereby certify that, pursuant to Local Rule 7.1(A)(2), I conferred with plaintiff's counsel, Attorney Paul Morenberg, on June 29, 2006 by telephone at approximately 12:15 p.m. Despite an attempt in good faith to resolve the issue presented by the within Motion and we were unable to do so.

/s/ Grace V. Bacon Garcia

Grace V. Bacon Garcia

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on August 21, 2006.

/s/Grace V. Bacon Garcia

Grace V. Bacon Garcia, BBO #640970